

SABATINI LAW FIRM, LLC

CARLO SABATINI
KRISTIN SABATINI

216 N. Blakely St.
Dunmore, PA 18512
Phone: (570) 341-9000
Fax: (570) 504-2769

Satellite Office: Wilkes-Barre 823-9000

January 17, 2025

Honorable Mark J. Conway
Max Rosenn U.S. Courthouse
197 South Main Street
Wilkes-Barre, PA 18701

(VIA CM/ECF ONLY)

Re: Kristin Wade Johannes
Middle District of PA Bankruptcy No. 5:20-bk-01044-MJC

Dear Judge Conway,

At Tuesday's hearing, Your Honor questioned two entries on my bill that had been made by my former partner, Brett Freeman, and ordered me to submit a letter or brief within 7 days providing additional information about those entries. The entries at issue are:

02/17/2021	Draft objection to claim.	BF 310.00	1.90	589.00
02/18/2021	Draft letter to Jefferson Capital.	BF 310.00	2.30	713.00

Your Honor logically theorized that an objection to a debt buyer's credit card claim might be something that would be form driven. If so, then the amount of time spent here drafting an objection and a letter would seem high. To allow you to review the work performed, the objection to claim is attached as Exhibit A and the letter is attached as Exhibit B.

My paralegal, Ashley Weisenfluh (f/k/a Ashley Werner), and I have each electronically searched our records and have found only two other cases where my office filed an objection during the last 10 years: Terrie Cozart 5:14-05172, objection filed on March 3, 2015 (attached as Exhibit C) and Mary Alice Schirg 5:15-05495, objection filed on November 1, 2018 (attached as Exhibit D).

A comparison of Exhibits A, C, and D shows that the objections are not based on form language. Instead, the objection that was filed here contains citations to three cases that were not mentioned in the earlier objections, including a 2019 decision which was not even entered until after those earlier proceedings. Thus, it seems clear that Attorney Freeman's drafting of the objection to the claim included time spent researching.

Similarly, the letter is not a form nor is it a simple cover letter that merely states "enclosed please find. . . ." Instead, the letter contains citations to six cases that were not mentioned in the motion. The time of 2.3 hours claimed for research, analysis, and drafting of this letter seems reasonable. (Compare [Maldonado v. Houstoun, 256 F.3d 181, 186 \(3d Cir. 2001\)](#), allowing about three hours per page for "researching and briefing an issue [before the Circuit] which [the applicant] had [*already*] successfully tried, researched, and briefed in the District Court.")

Thank you for allowing me this opportunity to address your concerns.

Sincerely yours,


Carlo Sabatini